# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Norfolk Division

In re: STEVEN DUANE CONRAD

Case No. 14-70322-SCS

Chapter 7

Debtor

# MOTION TO COMPEL TURNOVER OF PROPERTY OF THE ESTATE

Comes now Carolyn L. Camardo, Chapter 7 trustee ("Trustee") for the estate of STEVEN DUANE CONRAD ("Debtor") and moves this Honorable Court to compel the Debtor to turnover property of the estate and in support thereof states as follows:

- 1. STEVEN DUANE CONRAD ("Debtor") filed their voluntary Chapter 7 petition on January 28, 2014.
- 2. Carolyn L. Camardo was appointed as interim trustee in this case and continues to serve in that capacity.
- 3. Among the assets of the estate are non-exempt Federal and State tax refunds in the amount of \$3,614.15 (the "Refunds").
- 4. Pursuant to her statutory duty to liquidate property of the estate pursuant to 11 U.S.C. §704, the Trustee has made demand for turnover of the non-exempt Refunds in the amount of \$3,614.15.
  - 5. The Debtor has not turned over the Refunds despite demand.

WHEREFORE, Carolyn L. Camardo, Trustee, moves this Court for an order compelling the Debtor to turnover the non-exempt property of the estate in the amount of \$3,614.15 and for such other and further relief as is just under the circumstances.

Carolyn/L. Camardo, Trustee

#### **CERTIFICATE OF SERVICE**

I certify that a true copy of the foregoing Motion to Compel Turnover was served by first class mail postage prepaid or via the Electronic Case Filing (ECF) system, as appropriate and as indicated on the following parties this March 5, 2014:

Office of the United States Trustee\*
Federal Building, Room 625
200 Granby Street
Norfolk, Virginia 23510
[USTPRegion04.NO.ECF@usdoj.com]

Genene E. Gardner\*
The Merna Law Group
3419 Virginia Beach Blvd., #23
Virginia Beach, VA 23452
[gsaunders@mernalaw.com]

Steven Conrad 92 Provence Drive Apartment A 04 Stuarts Draft, VA 24477

Carolyn L. Camardo

[\* Indicates service by ECF or e-mail. All others served by First Class U.S. Mail, postage prepaid.]

## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Norfolk Division

In re: STEVEN DUANE CONRAD	) Case No 14-70322-SCS
Debtor	) Chapter 7 )
Address: 92 Provence Drive Apartment A 04	)
Stuarts Draft, VA 24477	)
Last four digits of Social Security: XXX-XX-0554	j

#### NOTICE OF MOTION TO COMPEL DEBTOR TO TURNOVER PROPERTY

**PLEASE TAKE NOTICE THAT**, Carolyn L. Camardo, Chapter 7 trustee ("Trustee") of the estate of STEVEN DUANE CONRAD ("Debtor"), filed a Motion to Compel Turnover of Property pursuant to 11 U.S.C. § 542 ("Motion"), requesting an order compelling the Debtor to turnover certain non-exempt assets.

Your rights may be affected. You should read the Motion carefully and discuss it with our attorney. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief requested in the Motion, then you or your attorney must attend a hearing to be scheduled at a later date. You will receive a separate notice of hearing.

Under Local Rule 9013-1, unless a written objection to the Motion is filed with <u>and</u> received by the Clerk of the Bankruptcy Court, U.S. Bankruptcy Court, Room 400, Walter B. Hoffman Courthouse, 600 Granby Street, Norfolk, VA 23510, and received by Carolyn L. Camardo, Trustee, 5101 Cleveland Street, Suite 200. Virginia Beach, VA., **on or before seven** (7) days before the scheduled hearing date, the Court may deem any opposition waived, treat the Motion as conceded, and enter an order granting the requested relief without further notice or hearing.

Dated: March 5, 2014

Carolyn/L. Camardo, Trustee

#### **CERTIFICATE OF SERVICE**

I certify that a true copy of the foregoing Notice of Motion to Compel Turnover of Property of the Estate was served by first class mail postage prepaid or via the Electronic Case Filing (ECF) system, as appropriate and as indicated on the following parties this March 5, 2014:

Office of the United States Trustee\*
Federal Building, Room 625
200 Granby Street
Norfolk, Virginia 23510
[USTPRegion04.NO.ECF@usdoj.com]

Genene E. Gardner\*
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Steven Conrad 92 Provence Drive Apartment A 04 Stuarts Draft, VA 24477

Carolyn L. Camardo, Trustee

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## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Norfolk Division

In re: STEVEN DUANE CONRAD

Case No. 14-70322-SCS

Chapter 7

Debtor

#### **NOTICE OF HEARING**

PLEASE TAKE NOTICE THAT Carolyn L. Camardo, Chapter 7 Trustee ("Trustee") of the estate of STEVEN DUANE CONRAD ("Debtor"), filed a Motion to Compel Turnover of Property of the Estate (the "Motion").

Your rights may be affected. You should read the Motion carefully and discuss it with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief requested in the Motion then you or your attorney must attend a hearing to be held on **April 24, 2014 at 10:00 AM** at Chief Judge St. John's Courtroom, 600 Granby Street, 4<sup>th</sup> Floor, Courtroom #1, Norfolk, Virginia.

Under Local Rule 9013-1, unless a written objection to the Motion is filed with and received by the Clerk of the Bankruptcy Court, U.S. Bankruptcy Court, 600 Granby Street, Room 400, Norfolk, VA 23510, and received by Carolyn L. Camardo, Trustee, 5101 Cleveland Street, Suite 200, Virginia Beach, VA 23462, on or before seven (7) days before the scheduled hearing date, the Court may deem any opposition waived, treat the Application as conceded, and enter an order granting the requested relief without further notice or hearing.

Dated: March 5, 2014

Carolyn L. Camardo, Trustee

# **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing Notice of Hearing was served first-class mail postage prepaid or via the Electronic Case Filing (ECF)\* or by e-mail\* on March 5, 2014, to the following:

Office of the United States Trustee\*
Federal Building, Room 625
200 Granby Street
Norfolk, Virginia 23510
[USTPRegion04.NO.ECF@usdoj.com]

Genene E. Gardner\*
The Merna Law Group
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Carolyn L. Camardo

Carolyn L. Camardo